



September 7, 2023

**Via ECF and E-mail**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF)* –  
Letter Motion to File Exhibits Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court’s Individual Rules of Practice in Civil Cases, we write to request permission to file the Exhibits 5 and 6 to Plaintiffs’ September 7, 2023 Letter Motion to the Court (“Plaintiffs’ Letter Motion”).

Exhibits 5 and 6 to Plaintiffs’ Letter Motion contain information that has been designated as Confidential or Attorneys’ Eyes Only by Defendants pursuant to this Court’s Protective Order. ECF No. 151, at ¶ 3. Plaintiffs do not object to the characterization of these exhibits and related redacted information as Confidential or Attorneys’ Eyes Only for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Exhibits 5 and 6 to Plaintiffs’ Letter Motion under seal, to avoid any improper disclosure of information Defendants have designated as Confidential or Attorneys’ Eyes Only. See ECF No. 151, at ¶ 4.b.

Hon. Katherine Polk Failla  
September 7, 2023

Respectfully submitted,

*/s/ Andrew R. Dunlap*

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cc: All Counsel of Record (via ECF)